

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,  
  
Plaintiff,

Case: 5:23-cr-20664  
Judge: Levy, Judith E.  
MJ: Patti, Anthony P.  
Filed: 11-28-2023

v.

Violation:  
8 U.S.C. § 1326(a)

Angel Josue TURCIOS HERRERA,  
  
Defendant.

\_\_\_\_\_ /

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES

**COUNT ONE**

**8 U.S.C. § 1326(a) - Unlawful Re-Entry**

On or about November 8, 2023, within the Eastern District of Michigan, Southern Division, Angel Josue TURCIOS-HERRERA, an alien who had been excluded, deported and removed from the United States on or about January 17, 2020, was found in the United States without the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland

Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a).

DAWN N. ISON  
United States Attorney

*s/Michael C. Martin*

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MICHAEL C. MARTIN  
Chief, National Security Unit

*s/Susan Fairchild*

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SUSAN FAIRCHILD  
Assistant United States Attorney

Dated: November 28, 2023

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned: <i>SF</i>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

**Case Title:** USA v. Angel Josue Turcios Herrera

**County where offense occurred :** Oakland

**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- **no** prior complaint.  
☐ Indictment/ ☒ Information --- based upon prior complaint [Case number: 23-mj-30464 ]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### **Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

November 28, 2023  
Date

*Susan Fairchild*  
 Susan Fairchild  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.